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ATTORNEYS FOR PLAINTIFFS AND THE PROPOSED CLASS

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MAGGIE THOMSON and JUAN DUARTE,  
as representatives of a class of similarly  
situated persons, and on behalf of the Caesars  
Entertainment Corporation Savings &  
Retirement Plan,

Plaintiff,

v.

RUSSELL INVESTMENTS TRUST  
COMPANY, CAESARS HOLDINGS,  
INC., THE PLAN INVESTMENT  
COMMITTEE, and THE 401(K) PLAN  
COMMITTEE.

Defendants.

**Case No. 2:21-cv-00961-CDS-BNW**

**STIPULATION REGARDING THIRD  
AMENDED COMPLAINT AND  
DEADLINE TO ANSWER OR  
OTHERWISE RESPOND**

**(FIRST REQUEST)**

Plaintiffs Maggie Thomson and Juan Duarte, as putative representatives of a purported class of similarly situated persons, and on behalf of the Caesars Entertainment Corporation Savings & Retirement Plan, and Defendants Russell Investments Trust Company, Caesars Holdings, Inc., the Plan Investment Committee, and the 401(k) Plan Committee (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree that Plaintiffs, pursuant to Fed. R. Civ. P. 15(a)(2), may file the attached, proposed Third Amended Complaint. Plaintiffs aver that there is good cause to enter into this stipulation to allow Plaintiffs to remove Maggie Thomson as a Plaintiff and add Danny Wanek as a Plaintiff, and that this stipulation is not made for purposes of delay.

Accordingly, the Parties request that the Court approve this stipulation, and grant Plaintiffs seven (7) days from the date of the Court’s entry to file the proposed Third Amended Complaint. Defendants do not waive any defenses by entering into this stipulation, and expressly reserve all rights to answer or otherwise respond to the Third Amended Complaint as they deem appropriate, including but not limited to challenging the standing of the newly named Plaintiff. The Parties also agree to move the Court to allow Defendants twenty-one (21) days to answer or otherwise respond to the Third Amended Complaint after it is filed.

Dated: July 5, 2023

NICHOLS KASTER, PLLP

/s/ Benjamin J. Bauer

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DATED: July 6, 2023

IT IS SO ORDERED.



United States Magistrate Judge